

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE
ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC;
UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**EMERGENCY MOTION TO EXTEND TIME TO FILE MOTION FOR RECONSIDERATION
OR OBJECTION TO THE MAGISTRATE'S RULING ON 3-21-24**

1. I hereby move the court to allow an extension of time until May 6, 2024 to file a motion for reconsideration or an objection to the magistrate's ruling on 3-21-24. Grounds are as follows.
2. On 3-21-24, the court issued a ruling on 3 motions, namely the motion to remand, the motion for remand discovery and the motion to default the Hilliard defendants. These motions by me were denied in a dense 18 page report.
3. The timeline of 14 days from the above date lands on 4-4-24. Thus, I believe that a motion for reconsideration or an objection to the ruling is due on 4-4-24.
4. This was a dense 18 page report and recommendation that I have to review and digest, and respond to.
5. As a result of the above timelines, there are timing conflicts that support an extension of time as follows.
 - a. I had two filings regarding sealing matters due on 4/1/24, which I recently filed with the court.
 - b. I have two other motions for reconsideration (pertaining to Pacer fees and a prior motion to stay deadline to file motion to amend the complaint) due by 4/3/24 (as indicated by the court's order on 3-27-23).
 - c. The defendants filed two hefty objections to the motion to amend complaint, on 3/25/24 and 3/26/24. The Donais defendants also filed a motion for leave to exceed page limits on 3/25/24 along with an oversized objection. My replies to the objections were due on Monday 4/1/24 (with respect to the Donais defendants) and Tuesday 4/2/24 (with respect to the Hilliard defendants). I had to spend time seeking an extension of time for those, which has now been extended to 4-14-24.
 - d. The objection to the motion for leave to exceed page limits was due in 14 days on Wednesday 4/8/24 but the court granted the motion before I could file an objection to that motion, which deprived me of a proper opportunity to object. I intend to seek reconsideration of this.
6. I thus have to work on motion for reconsideration regarding the 3 motions or an objection to the magistrate's ruling, while dealing with the several motion issues.
7. With all of the swirl of things going on, I am asking for an extension of time.
8. I request extension until Monday, May 6, 2024 (which is a Monday after a weekend) because I need time to review, digest and respond to the magistrate's ruling on 3 separate motions, which involves review of the 3 original motions (which are in themselves voluminous). The court's 18 page ruling is dense and contains numerous case references and legal points that I need to carefully research. Given the other deadlines due or that are coming due, including the deadlines for filing replies to the defendants' objections to the motion to amend the complaint in the next two weeks, it is eminently reasonable to allow extension after those deadlines have passed, and to allow me time to focus on the magistrate's ruling thereafter. May 6, 2024 is a reasonable request and is measured and conservative given the above mentioned circumstances.
9. Competing or conflicting multiple deadlines are usually considered by courts towards granting reasonable extensions of time.
10. I also have a need for reasonable accommodation as previously explained to the court. I thus further require in this instance an accommodation in light of the issues I have raised in prior related motions and given the court's ruling on 12-1-23.
11. Because of the urgency of the matter¹, I have styled this as an emergency motion.
12. I ask that this emergency motion be ruled upon as soon as possible.
13. Although because this involves dispositive motions/issues, and thus no seeking of concurrence is required, I still recently sought **concurrence from the defendants** but they have not concurred.
14. I respectfully request this Court grant the relief requested or other relief the Court deems proper.

¹ NB: I gave the court a heads up in my other motions to extend time filed recently that I would be filing this motion next.

April 2, 2024

Respectfully submitted,
/s/Andre Bisasor
Plaintiff Andre Bisasor

CERTIFICATE OF SERVICE

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor
Andre Bisasor